

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA)	
)	
Plaintiff,)	
)	
v.)	No. 4:16-CR-164 CEJ/PLC
)	
OZELL SYKES)	
)	
Defendant.)	

DEFENDANT'S MOTION FOR REVOCATION OF DETENTION ORDER

COMES NOW Defendant, Ozell Sykes, by and through his undersigned counsel Assistant Federal Public Defender, Charles Banks, and respectfully moves the Court pursuant to 18 United States Code Section 3145(b), for an ordering revoking the Order of Detention and establishing such conditions of release as the Court deems just and proper under the circumstances.

Mr. Sykes contends that the government failed to establish that there are **no** conditions of release which will reasonably assure his appearance and the safety of the community. This motion is based on all files, records, and proceedings, and the accompanying memorandum and proffer in support of the motion.

Respectfully submitted,

/s/Charles J. Banks
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ATTORNEY FOR DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that on August 15, 2016, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon John Bird, Assistant United States Attorney.

/s/Charles J. Banks
CHARLES J. BANKS
Assistant Federal Public Defender